

1 ANDREW WALTERS

2 P.O. BOX 208

3 INDIAN SPRINGS, NV

4 89018

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6
7 UNITED STATES BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10
11 BANKRUPTCY CASE # 19-30088 (DM)
12 CHAPTER 11

13 CREDITOR

14 ANDREW WALTERS - CLAIM # 86837 "RESPONSE"

15 MAY 24, 2022 (DEADLINE)

16 REORGANIZED DEBTOR'S

17 PG&E CORPORATION

18 PACIFIC GAS AND ELECTRIC COMPANY

19 OPPOSE THE DISALLOWANCE
20 OF OBJECTED TO PROOF'S
21 OF CLAIM

22 TO THE HONORABLE JENNIS MONTALI, U.S. BANKRUPTCY JUDGE

23 "RESPONSE"

24 FIRE VICTIM, ANDREW WALTERS FILES HIS RESPONSE

25 OPPOSING ALL OF THE "DEBTOR'S" DEFENSES. IN ADDITION

26 ASK THAT THE BANKRUPTCY COURT SHOULD NOT SUSTAIN

27 THE DRASTIC OBJECTION. CLAIMANT MAILED HIS CLAIM

28 ON 10-16-19, 5 DAYS BEFORE THE BAR DATE ORDER

1 10-21-19 (DEADLINE). THE DEBTORS WERE IN POSSESSION
2 OF MR. WALTERS CLAIM ON 10-21-19. THE CLAIMANT
3 BY VIRTUE OF THE U.S. MAIL SERVICE DELIVERED HIS
4 CLAIM TO BE PROCESS IN A TIMELY MANNER, THE
5 BARRED STATUTE OF LIMITATION COUNTER BY THE DEBTORS
6 ALSO FAIL TO LINK SECTION 350 OF CCCP TO A PROCEDURAL
7 ACTION THIS CLAIMANT FAILED TO MAKE, THE SOLE
8 RESPONSIBILITY THIS CLAIMANT HAS LEGALLY IS TO
9 SUBMIT THE CLAIM BEFORE 10-21-19 "BAR DATE ORDER".

10 UNDER FEDERAL LAW A CLAIMANT / PLAINTIFF ARE
11 AFFORDED ADDITIONAL TIME TO COMMENCE A COURT
12 ACTION AFTER LEARNING OF INJURY (PROPERTY DAMAGE)
13 TO FILE COMPLAINT. IN THIS CASE DAMAGES WAS
14 OBSERVED ON 10-14-19. IN VIEW OF PROPERTY DAMAGES,
15 THE DEBTORS HAVE NO SCIENTIFIC STUDIES OF AIR QUALITY
16 THAT WOULD OPPOSE CLAIM OF DAMAGES CAUSED BY
17 SMOKE, SOOT, DEBRIS. CLEARLY THE BURDEN OF PROOF IS
18 ON THE DEBTORS TO DISPROVE THIS FACT. THE DEBTORS
19 ARE RESPONSIBLE FOR THIS PROPERTY DAMAGE AND SHOULD
20 NOT BE ALLOWED TO AVOID LIABILITY.

21 THE CLAIMANT HAS PROVIDED A LEGAL BASIS FOR RECOVERY
22 AGAINST THE REORGANIZED DEBTORS. FIRST, CLAIMANT
23 POINTS OUT (IN THE CLAIM) THE CAUSE OF DAMAGES
24 DERIVE FROM THE "FIRES". THE DEBTORS HAVE NOT PROVIDED
25 ANY EVIDENCE TO REFUTE THIS.

26 THE BANKRUPTCY COURT SHOULD NOT SUSTAIN THE OMNIBUS
27 OBJECTION. FIRST, IT WOULD VIOLATE THIS CLAIMANT
28 U.S. CONSTITUTIONAL RIGHT (4TH AMEND.) DUE PROCESS.

1 THE DEBTOR'S STATE THE CHAPTER 11 CASES ARE BEING
2 JOINTLY ADMINISTERED FOR PROCEDURAL PURPOSES
3 ONLY PURSUANT TO BANKRUPTCY RULE 1015(b). FACT,
4 THIS IS A PREJUDICE CLASSIFICATION OF MR. WALTERS
5 CLAIM. HIS CLAIM STANDS ALONE ALLEGING
6 "ENVIRONMENTAL DAMAGE" WHICH HAS BEEN UNCHALLENGED
7 BY THE DEBTOR'S ON THIS ISSUE.
8
9

10 RELIEF REQUESTED

11
12 THIS RESPONSE SEEK AN ORDER DENYING (ALL) OF THE
13 "DEBTOR'S OMNIBUS OBJECTIONS TO CLAIM. IT ALSO
14 SEEKS PROTECTIONS AFFORDED BY THE 4TH, 6TH AMEND.
15 U.S. CONST. IN ADDITION, RESPONSE SEEKS
16 APPOINTMENT OF COUNSEL FOR AMENDED RESPONSE.
17

18 DECLARATION

19
20 I, ANDREW WALTERS DECLARE I HAVE PERSONAL
21 KNOWLEDGE OF RELEVANT FACTS THAT SUPPORT
22 MY CLAIM & RESPONSE. ADDITIONATELY I HAVE
23 DIRECT KNOWLEDGE OF DAMAGES OCCURRED BY
24 THE FIRE(S).

25 DATED: MAY 6TH, 2022

26 Andrew Walters
27 CLAIMANT
28

S.D.L.
Andrew Walters 105 1567
P.O. Box 208
Midland Springs, NV 89018

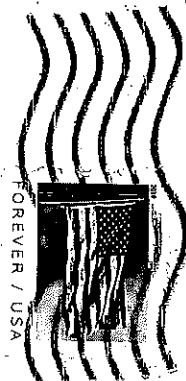
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MAY 12 2022

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

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Northern District of California
Courtroom 17, 16th floor
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San Francisco, Calif. 94102

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